



NATIONAL GRANGE

OF THE ORDER OF PATRONS OF HUSBANDRY

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American Values. Hometown Roots.

Received & Inspected

September 30, 2015

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FCC Mail Room

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42, WC Docket No. 09-197, WC Docket No. 10-90

Dear Ms. Dortch:

The National Grange respectfully submits these reply comments on the Federal Communications Commission's (FCC) Second Further Notice of Proposed Rulemaking (FNPRM) in the above-captioned dockets. The FNPRM was published in the Federal Register on July 17, 2015. We submitted initial comments in the docket on August 30, 2015.

The National Grange is concerned about the proposal to move Lifeline eligibility to Supplemental Nutrition Assistance Program (SNAP) only. While we appreciate the idea of "coordinated enrollment," we think the current program qualifications, which include Medicaid, TANF, SSI and other benefits programs for low-income people, should continue. We also believe that the qualifiers should be expanded to include programs explicitly targeted to low-income veterans such as the Veterans Pension Benefit program and the Veterans Affairs Supportive Housing program, as proposed in the FNPRM.

In our experience representing members in rural America, we have found that recipients of SNAP benefits do not always overlap with other programs the FCC currently recognizes as automatic qualifications for Lifeline. In fact, recent estimates are that three in five Lifeline-eligible, older adults do not participate in SNAP. Additionally, research has shown that stigma lowers rural residents' participation in other safety-net programs like the SNAP or TANF – so

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2 <http://www.chicagotribune.com/suburbs/oak-park/community/chi-ugc-article-ageoptions-is-working-to-eradicate-senior-hun-4-2015-09-23-story.html>

3 <http://www.dailyyonder.com/rural-kids-less-likely-accept-free-lunch/2015/08/17/7936/>

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why limit the number of programs in general, when participation rates are already unsatisfactory?

We appreciate the FCC's efforts and would welcome the opportunity to meet with you to discuss our concerns about making broadband and wireless technologies available in rural America.

Thank you for your consideration.

Fraternally Yours,

A handwritten signature in cursive script, appearing to read "Ed L. Luttrell".

Edward L. Luttrell, Master
National Grange

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